

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

REMBRANDT SOCIAL MEDIA, LP

Plaintiff

v.

FACEBOOK, INC. and
ADDTHIS, INC.

Defendants.

Civil Action No. 1:13-cv-00158
(TSE/TRJ)

MOTION TO DISMISS PURSUANT TO FED. R. CIV. P. 12(B)(6)

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT Defendant AddThis, Inc. will and hereby moves the Court to enter an Order dismissing Plaintiff Rembrandt Social Media, LP's ("Rembrandt") Complaint as set forth in greater detail in the accompanying papers in support of this motion.

Dated: March 12, 2013

Respectfully submitted,

By: /s/ Christopher C. Campbell

COOLEY LLP

Christopher C. Campbell (Va. Bar. No.
36244)

ccampbell@cooley.com

One Freedom Square – Reston Town
Center

11951 Freedom Drive

Reston, Virginia 20190-5656

Tel: 703 456-8000

Fax: 703 456-8100

Attorneys for Defendant AddThis, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on March 12, 2013, a copy of the foregoing MOTION TO DISMISS PURSUANT TO FED. R. CIV. P. 12(B)(6) was served on the following counsel of record via the Court's Electronic Filing System:

Ahmed J. Davis (Va. Bar No. 43982)
FISH & RICHARDSON
1425 K Street N.W., 11th Floor
Washington, D.C. 20005
Telephone: (202) 783-5070

/s/ Christopher C. Campbell
COOLEY LLP
Christopher C. Campbell (Va. Bar. No. 36244)
ccampbell@cooley.com
One Freedom Square – Reston Town Center
11951 Freedom Drive
Reston, Virginia 20190-5656
Tel: 703 456-8000
Fax: 703 456-8100

Attorneys for Defendant AddThis, Inc.